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Attorney for Defendant
KATRINA RAPP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TITAN INDEMNITY COMPANY, a Texas
corporation,

Plaintiff,

vs.

A PLUS TOWING, a General Partnership;
JOSE HERMOSILLO, individually and dba A
PLUS TOWING; FERNANDO
HERMOSILLO, individually and dba A PLUS
TOWING; A PLUS TOWING, a business
organization form unknown, and KATRINA
RAPP, an individual, and DOES 1-10,

Defendants.

CASE NO.: C 14-03864 WHA

**STIPULATION TO CONTINUE HEARING
DATE OF PLAINTIFF TITAN INDEMNITY
COMPANY'S MOTION FOR SUMMARY
JUDGMENT AND [~~PROPOSED~~] ORDER**

Date: September 3, 2015

Time: 8:00 a.m.

Judge: Hon. William Alsup

Dept.: Courtroom 8, 19th Floor

Complaint Filed: August 26, 2014

Plaintiff Titan Indemnity Company (“Titan”) and Defendant Katrina Rapp, (“Defendant Rapp”) hereby stipulates as follows:

1. The hearing on Titan’s Motion for Summary Judgment is currently schedule for September 3, 2015 at 8:00 a.m.

2. On July 30, 2015, Titan filed its Notice of Motion and Motion for Summary Judgment.

3. On July 31, 2015, Defendant Rapp promptly contacted Titan and asked if Titan would be willing to continue the hearing in order to extend Defendant Rapp’s response presently due on August 13, 2015. Defendant Rapp’s counsel is schedule to leave on a long planned family vacation on August 7, 2015 and will not be returning to the office until August 24, 2015.

4. On August 3, 2015, Titan agreed to continue the hearing until September 17, 2015.

5. In light of the foregoing, the parties respectfully request that the hearing on the Motion for Summary Judgment be continued to September 17, 2015 at 8:00 a.m. and that all associated deadlines be continued accordingly.

IT IS SO STIPULATED.

DATED: August 5, 2015

Respectfully submitted,

KRANKEMANN | PETERSEN LLP

By: /s/ Martin Reilley

MARTIN T. REILLEY

Attorney for Defendant

KATRINA RAPP

SELMAN BREITMAN LLP

By: /s/ Galina Klester Jakobson

GALINA KLESTER JAKOBSON

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Attorneys for Plaintiff

TITAN INDEMNITY COMPANY

[PROPOSED] ORDER


Pursuant to stipulation of the parties, and good cause appearing therefore, it is hereby ordered that:

1. The date for Plaintiff Titan Indemnity Company's hearing on the Motion for Summary Judgment has been continued from September 3, 2015 to September 17, 2015 at 8:00 a.m.

2. ~~All deadlines associated with the Motion shall be continued accordingly.~~

IT IS SO ORDERED. Plaintiff's opposition is now due on August 27, 2015. Defendant's reply is due on September 3, 2015.

Dated: August 11, 2015.



Hon. William Alsup
United States District Judge